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Attorneys for the AmeriTrust Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)
(Jointly Administered)

Chapter 11

**MOTION FOR LEAVE TO FILE LATE
AND OPPOSITION AND RESPONSE TO
REORGANIZED DEBTORS' ELEVENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (CLAIMS BARRED BY
THE STATUTE OF REPOSE)**

Hearing Information:

Date: September 14, 2021
Time: 10:00 a.m. (Pacific Time)
Place: (Telephone Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Individual Claimants Robert H. Cobb, Rosemary Cobb and Delbert E. Snoberger IRA (the “AmeriTrust Claimants”),¹ as creditors in the chapter 11 bankruptcy cases (the “Chapter 11 Cases”) of the above-captioned debtors (as reorganized pursuant to the Plan, the “Reorganized Debtors”), respectfully submit this motion for leave to file late and opposition and response to the Reorganized Debtors’ Eleventh Securities Claims Omnibus Objection (the “Eleventh Objection”) [Docket No. 11014] seeking to expunge certain debt-based securities proofs of claim as barred by the statute of repose under Section 11 of the Securities Act of 1933 (the “Securities Act”).

MOTION FOR LEAVE TO FILE OPPOSITION AND RESPONSE LATE

As ground for this motion, the AmeriTrust Claimants state that they did not receive effective notice of the Eleventh Objection and were unable to lodge their objection until today. In addition, since other claimants lodged objections before and after the purported August 31, 2021 deadline to do so, there will be no prejudice to the parties or disruption of the Court’s schedule by allowing the AmeriTrust Claimants to appear and assert their opposition to the Eleventh Objection.

OPPOSITION AND RESPONSE

The AmeriTrust Claimants respectfully join in the substantive oppositions already on file to the Eleventh Objection [Docket Nos. 11168 and 11170].

RESERVATION OF RIGHTS

The AmeriTrust Claimants reserve all their respective rights, claims, defenses, and remedies, including, without limitation, the right to amend, modify or supplement this opposition in accordance with applicable rules.

¹ A list of the applicable claim numbers and other pertinent information for each of the AmeriTrust Claimants is attached hereto as Appendix A.

1 Dated: September 8, 2021

ROLNICK KRAMER SADIGHI LLP

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3 By:



4 RICHARD A. BODNAR

5 *Attorneys for the AmeriTrust Claimants*

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NEW YORK, NY 10020

CERTIFICATE OF SERVICE

I, Richard A. Bodnar, do declare and state as follows:

I am Senior Counsel of Rolnick Kramer Sadighi LLP, located at 1251 Avenue of the Americas, New York, New York 10020. I am over the age of 18 and not a party to this action.

On September 8, 2021, I served the following documents on the interested parties in this action through the Notice of Electronic Filing for all parties and counsel who are registered ECF Users.

- Motion for Leave to File Late and Opposition and Response to Reorganized Debtors' Eleventh Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that if called upon to witness, I could and would testify competently thereto.

Executed on September 8, 2021 at New York, New York.



Richard A. Bodnar

APPENDIX A

CREDITOR	CLAIM NO.	DATE	AMOUNT OF CLAIM	NOTICE ADDRESS
Rosemary Cobb	103127	4/24/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 rbodnar@rksllp.com
Robert H. Cobb	103017	4/24/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 rbodnar@rksllp.com
Delbert E Snoberger IRA	104332	5/11/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 rbodnar@rksllp.com